

EXCEPTION

EXCEPTION 27

BellSouth Florida OSS Testing Evaluation

Date: March 12, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the “Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)” Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth’s Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth’s published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

¹ The term “processed data” refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term “PMAP raw data”.

² *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

EXCEPTION 27

BellSouth Florida OSS Testing Evaluation

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non-Dispatch	19999	816701	2.45%	3.06%
3	BST; Residence	<10 Circuits	24235	872278	2.78%	10.79%
4	BST; Residence	>=10 Circuits; Dispatch	11	101	10.89%	9.80%
5	BST; Residence	>=10 Circuits; Non-Dispatch	4834	0	DIV/0	N/A
6	BST; Residence	>=10 Circuits	4845	101	4797.03%	9.80%
7	BST; Business	<10 Circuits; Dispatch	1089	16483	6.61%	6.86%
8	BST; Business	<10 Circuits; Non-Dispatch	2166	56070	3.86%	4.36%
9	BST; Business	<10 Circuits	3255	72553	4.49%	11.21%
10	BST; Business	>=10 Circuits; Dispatch	50	453	11.04%	7.25%
11	BST; Business	>=10 Circuits; Non-Dispatch	279	487	57.29%	0.41%
12	BST; Business	>=10 Circuits	329	940	35.00%	7.66%
13	BST; Design	<10 Circuits; Dispatch	81	6289	1.29%	2.35%
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%

EXCEPTION 27

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
15	CLEC; Residence	<10 Circuits; Dispatch	84	1035	8.12%	7.92%
16	CLEC; Residence	<10 Circuits; Non- Dispatch	594	14248	4.17%	4.41%
17	CLEC; Residence	<10 Circuits	678	15283	4.44%	12.33%
18	CLEC; Residence	>=10 Circuits; Non- Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non- Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non- Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non- Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%

EXCEPTION 27

BellSouth Florida OSS Testing Evaluation

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
31	CLEC; UNE Non-Design	>=10 Circuits; Non-Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

⁴ BellSouth's Response to Observation 32, 01/31/01.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 27



Florida OSS Test
Exception 27

April 19, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 27

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non-Dispatch	19999	816701	2.45%	3.06%
3	BST; Residence	<10 Circuits	24235	872278	2.78%	10.79%
4	BST; Residence	>=10 Circuits; Dispatch	11	101	10.89%	9.80%
5	BST; Residence	>=10 Circuits; Non-Dispatch	4834	0	DIV/0	N/A
6	BST; Residence	>=10 Circuits	4845	101	4797.03%	9.80%
7	BST; Business	<10 Circuits; Dispatch	1089	16483	6.61%	6.86%
8	BST; Business	<10 Circuits; Non-Dispatch	2166	56070	3.86%	4.36%
9	BST; Business	<10 Circuits	3255	72553	4.49%	11.21%
10	BST; Business	>=10 Circuits; Dispatch	50	453	11.04%	7.25%
11	BST; Business	>=10 Circuits; Non-Dispatch	279	487	57.29%	0.41%
12	BST; Business	>=10 Circuits	329	940	35.00%	7.66%
13	BST; Design	<10 Circuits; Dispatch	81	6289	1.29%	2.35%
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%
15	CLEC; Residence	<10 Circuits; Dispatch	84	1035	8.12%	7.92%
16	CLEC; Residence	<10 Circuits; Non-Dispatch	594	14248	4.17%	4.41%
17	CLEC; Residence	<10 Circuits	678	15283	4.44%	12.33%

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 27

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
18	CLEC; Residence	>=10 Circuits; Non-Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non-Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non-Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non-Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%
31	CLEC; UNE Non-Design	>=10 Circuits; Non-Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

⁴ BellSouth's Response to Observation 32, 01/31/01.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 27

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

Due to additional coding changes to Provisioning: Percent Troubles within 30 days, BellSouth will provide KPMG the April 2001 data when available.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 27



Florida OSS Test
Exception 27

May 18, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

³ These reports and PMAP raw data may be delivered in hard copy or via the PMAP Web site.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 27

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non- Dispatch	19999	816701	2.45%	3.06%
3	BST; Residence	<10 Circuits	24235	872278	2.78%	10.79%
4	BST; Residence	>=10 Circuits; Dispatch	11	101	10.89%	9.80%
5	BST; Residence	>=10 Circuits; Non- Dispatch	4834	0	DIV/0	N/A
6	BST; Residence	>=10 Circuits	4845	101	4797.03%	9.80%
7	BST; Business	<10 Circuits; Dispatch	1089	16483	6.61%	6.86%
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10	BST; Business	>=10 Circuits; Dispatch	50	453	11.04%	7.25%
11	BST; Business	>=10 Circuits; Non- Dispatch	279	487	57.29%	0.41%
12	BST; Business	>=10 Circuits	329	940	35.00%	7.66%
13	BST; Design	<10 Circuits; Dispatch	81	6289	1.29%	2.35%
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%
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17	CLEC; Residence	<10 Circuits	678	15283	4.44%	12.33%

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 27

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
18	CLEC; Residence	>=10 Circuits; Non- Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non- Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non- Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non- Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%
31	CLEC; UNE Non-Design	>=10 Circuits; Non- Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

⁴ BellSouth's Response to Observation 32, 01/31/01.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 27

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Response:

Due to additional coding changes to Provisioning: Percent Troubles within 30 days, BellSouth will provide KPMG the April 2001 data when available.

BellSouth Amended Response:

The changes that were originally planned for the May 1st production run (April data) were not implemented. They are scheduled for the June 1st production run (May data). BellSouth suggests that KPMG use the May 2001 data when available.

FLORIDA OSS BELL SOUTH'S 2ND AMENDED RESPONSE TO EXCEPTION 27



Florida OSS Test
Exception 27

July 5, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

¹ The term "processed data" refers to the data used to validate SQM calculations. For certain SQMs, BellSouth uses the term "PMAP raw data".

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

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FLORIDA OSS BELLSOUTH'S 2ND AMENDED RESPONSE TO EXCEPTION 27

	Measurement	Category	KPMG Consulting- Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting- Calculated Value	BellSouth Reported Value
1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non- Dispatch	19999	816701	2.45%	3.06%
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FLORIDA OSS BELL SOUTH'S 2ND AMENDED RESPONSE TO EXCEPTION 27

	Measurement	Category	KPMG Consulting-Calculated Numerator	KPMG Consulting-Calculated Denominator	KPMG Consulting-Calculated Value	BellSouth Reported Value
18	CLEC; Residence	>=10 Circuits; Non-Dispatch	25	0	DIV/0	N/A
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BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

⁴ BellSouth's Response to Observation 32, 01/31/01.

FLORIDA OSS BELL SOUTH'S 2ND AMENDED RESPONSE TO EXCEPTION 27

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth Amended Response:

The changes that were originally planned for the June 1st production run (May data) were not implemented. They are scheduled for the July 1st production run (June data).

FLORIDA OSS BELLSOUTH'S 3rd AMENDED RESPONSE TO EXCEPTION 27



Florida OSS Test
Exception 27

August 17, 2001

EXCEPTION REPORT

An Exception has been identified as a result of the test activities associated with the Metrics Calculations Verification and Validation Review (PMR-5). This exception was originally issued as Observation 32.

Exception:

KPMG Consulting cannot replicate the values in the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" Service Quality Measurement (SQM) report for the CLEC Aggregate (May 2000). (PMR-5)

Background:

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Florida Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Florida. BellSouth also publishes the monthly processed data¹ (PMAP raw data²) used to create these reports.³

Issue:

As part of the BellSouth-Florida OSS Evaluation, KPMG Consulting attempted to replicate these reports using BellSouth's published PMAP Raw Data User Manual, where applicable, and the corresponding raw data, supported by technical assistance from BellSouth.

KPMG Consulting was unable to replicate the BellSouth reported values for the "Provisioning: Troubles Within 30 Days of Provisioning" SQM. The discrepancies are listed in the following table.

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² *The PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding processed data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site. KPMG Consulting relied on the May 15, 2000 version of the Manual.

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**FLORIDA OSS BELL SOUTH'S 3rd AMENDED RESPONSE TO
EXCEPTION 27**

	Measurement	Category	KPMG Consulting - Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting - Calculated Value	BellSouth Reported Value
1	BST; Residence	<10 Circuits; Dispatch	4236	55577	7.62%	7.72%
2	BST; Residence	<10 Circuits; Non- Dispatch	19999	816701	2.45%	3.06%
3	BST; Residence	<10 Circuits	24235	872278	2.78%	10.79%
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5	BST; Residence	>=10 Circuits; Non- Dispatch	4834	0	DIV/0	N/A
6	BST; Residence	>=10 Circuits	4845	101	4797.03%	9.80%
7	BST; Business	<10 Circuits; Dispatch	1089	16483	6.61%	6.86%
8	BST; Business	<10 Circuits; Non- Dispatch	2166	56070	3.86%	4.36%
9	BST; Business	<10 Circuits	3255	72553	4.49%	11.21%
10	BST; Business	>=10 Circuits; Dispatch	50	453	11.04%	7.25%
11	BST; Business	>=10 Circuits; Non- Dispatch	279	487	57.29%	0.41%
12	BST; Business	>=10 Circuits	329	940	35.00%	7.66%
13	BST; Design	<10 Circuits; Dispatch	81	6289	1.29%	2.35%

**FLORIDA OSS BELL SOUTH'S 3rd AMENDED RESPONSE TO
EXCEPTION 27**

	Measurement	Category	KPMG Consulting - Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting - Calculated Value	BellSouth Reported Value
14	BST; Design	<10 Circuits	82	6794	1.21%	2.55%
15	CLEC; Residence	<10 Circuits; Dispatch	84	1035	8.12%	7.92%
16	CLEC; Residence	<10 Circuits; Non- Dispatch	594	14248	4.17%	4.41%
17	CLEC; Residence	<10 Circuits	678	15283	4.44%	12.33%
18	CLEC; Residence	>=10 Circuits; Non- Dispatch	25	0	DIV/0	N/A
19	CLEC; Residence	>=10 Circuits	25	3	833.33%	N/A
20	CLEC; Business	<10 Circuits; Dispatch	27	431	6.26%	7.19%
21	CLEC; Business	<10 Circuits; Non- Dispatch	112	2387	4.69%	5.01%
22	CLEC; Business	<10 Circuits	139	2818	4.93%	12.21%
23	CLEC; Business	>=10 Circuits; Dispatch	5	6	83.33%	16.67%
24	CLEC; Business	>=10 Circuits; Non- Dispatch	4	13	30.77%	7.69%
25	CLEC; Business	>=10 Circuits	9	19	47.37%	24.36%
26	CLEC; Design	<10 Circuits	1	83	1.20%	1.89%
27	CLEC; UNE Design	<10 Circuits; Dispatch	31	1245	2.49%	13.64%

FLORIDA OSS BELL SOUTH'S 3rd AMENDED RESPONSE TO EXCEPTION 27

	Measurement	Category	KPMG Consulting - Calculated Numerator	KPMG Consulting- Calculated Denominator	KPMG Consulting - Calculated Value	BellSouth Reported Value
28	CLEC; UNE Design	<10 Circuits	31	1245	2.49%	13.64%
29	CLEC; UNE Non-Design	<10 Circuits; Non- Dispatch	14	1048	1.34%	1.43%
30	CLEC; UNE Non-Design	<10 Circuits	14	1582	0.88%	1.43%
31	CLEC; UNE Non-Design	>=10 Circuits; Non- Dispatch	1	26	3.85%	N/A
32	CLEC; UNE Non-Design	>=10 Circuits	1	49	2.04%	N/A

BellSouth's Response to Observation 32⁴ indicated that a change request was submitted for the "Provisioning: Troubles Within 30 Days of Provisioning (Non-Trunks)" measure and has been implemented.

Impact:

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. KPMG Consulting's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the SQM may be in question. Without accurate SQMs, CLECs might not be able to assess the quality of service received or plan for future business activities reliably.

BellSouth 2nd Amended Response:

The changes that were originally planned for the June 1st production run (May data) were not implemented. They are scheduled for the July 1st production run (June data).

BellSouth 3rd Amended Response:

The changes that were planned for the July 1st production run (June data) were not implemented. The changes are targeted to be effective for July data.

⁴ BellSouth's Response to Observation 32, 01/31/01.

EXCEPTION

EXCEPTION 37
BellSouth Florida OSS Testing Evaluation

Date: March 22, 2001

EXCEPTION REPORT

KPMG Consulting has identified this exception as a result of the Billing Work Center/Help Desk. (PPR10)

Exception:

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk. (PPR10)

Issue:

During interviews with BellSouth Subject Matter Experts (SMEs) for PPR10: Billing Help Desk/Work Center Evaluation¹, KPMG Consulting noted the lack of a formal process to address work force capacity planning in the Billing Work Center.

BellSouth management relies on reports generated by the Billing Dispute Activity Tracking System (BDATS) to track the volume of disputes and uses the information to make staffing decisions. No formal documented capacity management process exists which encompasses total current and historical work volume, commitment intervals, production work time requirements, business conditions and market growth factors.

Impact:

Without adequate forecasting and capacity planning procedures, BellSouth's ability to respond to growth in CLEC inquiries and requests may be impaired. Such impairment can impact performance stability, including timeliness of response and resolution of claims.

¹ Interviews conducted with Managers at BellSouth Billing Work Center in Birmingham, AL, on 11/16/00.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 37



Florida OSS Test
Exception 37

April 18, 2001

EXCEPTION REPORT

KPMG Consulting has identified this exception as a result of the Billing Work Center/Help Desk. (PPR10)

Exception:

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk. (PPR10)

Issue:

During interviews with BellSouth Subject Matter Experts (SMEs) for PPR10: Billing Help Desk/Work Center Evaluation¹, KPMG Consulting noted the lack of a formal process to address work force capacity planning in the Billing Work Center.

BellSouth management relies on reports generated by the Billing Dispute Activity Tracking System (BDATS) to track the volume of disputes and uses the information to make staffing decisions. No formal documented capacity management process exists which encompasses total current and historical work volume, commitment intervals, production work time requirements, business conditions and market growth factors.

Impact:

Without adequate forecasting and capacity planning procedures, BellSouth's ability to respond to growth in CLEC inquiries and requests may be impaired. Such impairment can impact performance stability, including timeliness of response and resolution of claims.

BellSouth Response:

BellSouth Billing & Collections Operations has an existing formal process to address work force capacity planning in the Billing Work Center. Private and proprietary information regarding this process is provided to KPMG in a separate attachment. Work force capacity planning documents were provided 9/7/00 to Carol Matlak at KPMG as part of PPR7 and PPR8 process tests.

¹ Interviews conducted with Managers at BellSouth Billing Work Center in Birmingham, AL, on 11/16/00.

FLORIDA OSS BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 37



Florida OSS Test
Exception 37

June 14, 2001

EXCEPTION REPORT

KPMG Consulting has identified this exception as a result of the Billing Work Center/Help Desk. (PPR10)

Exception:

BellSouth's Billing Work Center lacks a formal process for identifying and planning for variations in the level of staff required to support work load for the Billing Work Center/Help Desk. (PPR10)

Issue:

During interviews with BellSouth Subject Matter Experts (SMEs) for PPR10: Billing Help Desk/Work Center Evaluation¹, KPMG Consulting noted the lack of a formal process to address work force capacity planning in the Billing Work Center.

BellSouth management relies on reports generated by the Billing Dispute Activity Tracking System (BDATS) to track the volume of disputes and uses the information to make staffing decisions. No formal documented capacity management process exists which encompasses total current and historical work volume, commitment intervals, production work time requirements, business conditions and market growth factors.

Impact:

Without adequate forecasting and capacity planning procedures, BellSouth's ability to respond to growth in CLEC inquiries and requests may be impaired. Such impairment can impact performance stability, including timeliness of response and resolution of claims.

BellSouth Response:

BellSouth Billing & Collections Operations has an existing formal process to address work force capacity planning in the Billing Work Center. Private and proprietary information regarding this process is provided to KPMG in a separate attachment. Work force capacity planning documents were provided 9/7/00 to Carol Matlak at KPMG as part of PPR7 and PPR8 process tests.

¹ Interviews conducted with Managers at BellSouth Billing Work Center in Birmingham, AL, on 11/16/00.

FLORIDA OSS BELL SOUTH'S AMENDED RESPONSE TO EXCEPTION 37

BellSouth Amended Response:

BellSouth does utilize force-sizing models in its capacity management process for the Local Billing & Collections center. During an interview in the Local Billing & Collections center for PPR10, incorrect information was provided to KPMG. The BellSouth employee KPMG interviewed is neither the owner nor the direct recipient of the force-sizing model used in the force staffing process. There is a formal model in place that has been used for some time to drive force levels.

Output data from the LCSC Ordering Force Model is used as input for the Local Billing & Collections center force-sizing model. A description of the input and output data for the force-sizing model process has been included with the force model. A copy of the proprietary force-sizing model has been attached for KPMG to review. KPMG may refer to BellSouth's response to Exception 48 for additional information regarding the overall staffing process.